



July 6, 2018

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Globalstar, Inc. Petition for Notice of Inquiry Regarding the Operation of
Outdoor U-NII-1 Devices in the 5 GHz Band – RM-11808*

Dear Ms. Dortch:

GEOS Response, LLC ("GEOS") strongly supports Globalstar, Inc.'s ("Globalstar's") above-captioned Petition for Notice of Inquiry ("Globalstar Petition"). GEOS offers safety, security and monitoring solutions to fit every need. We operate the International Emergency Response Coordination Center (IERCC), known worldwide for emergency response coordination. For over ten years, we have worked closely with Globalstar to ensure the safety and security of their customers worldwide. To date, our combined efforts have resulted in nearly 6,000 life-saving rescues globally, with over 4,000 of those rescues occurring in the U.S. or Canada. We are currently averaging about two rescues a day for Globalstar customers worldwide. With Globalstar's recent introduction of its SPOT X two-way texting device, we expect significant growth in the demand for emergency response from Globalstar customers.

Protecting Globalstar's licensed MSS against harmful interference from unlicensed U-NII-1 operations is a critical concern for us and our business. Our mission is to ensure that people in trouble get timely assistance, and Globalstar products have played a significant role in meeting that goal.

We are gravely concerned with the sharp rise in the noise level measured by Globalstar's satellites in the 5.1 GHz band, where Globalstar is licensed for "feeder uplink" transmissions from its gateway earth stations to its satellites. Anything which diminishes the capacity or reliability of the Globalstar system in North America has the potential to put lives at risk. The FCC should expeditiously issue a Notice of Inquiry on aggregate interference issues in the 5.1 GHz band.

While Globalstar's licensed MSS enjoys legal protection against harmful interference from unlicensed U-NII-1 operations, it seems clear from the Globalstar Petition that the rise in the noise floor is being caused by the outdoor, high-power operation of U-NII-1 Wi-Fi access

points and other devices. Since Globalstar is only experiencing this noise rise over North America, it appears that this increase in harmful interference is most likely the result of the changes adopted by the FCC in the 5.1 GHz band in its 2014 order.

In its 2014 order, the FCC said that it would take "corrective action" if Globalstar and its customers experience harmful interference from outdoor U-NII-1 operations. Accordingly, we urgently request that the FCC take rapid action to address the harmful interference which Globalstar is experiencing and avoid any unnecessary risks for Globalstar customers who depend on us for live-saving services.

Respectfully submitted,

/s/ 
Mark Garver
CEO